

Joint Status Report Pursuant to Rule 26(f)

Caption: **Maravilla Morales v. Trans Union, LLC, et al.** Civil Action No: **2:15-cv-6003-GJP**

Basis of Jurisdiction: **15 U.S.C. § 1681p and 28 U.S.C. § 1331**

Jury Trial: **X** Non-Jury Trial: _____ Arbitration: _____

Plaintiff's counsel participating in the Rule 26 Conference: **Gregory J. Gorski**

Defendants counsel participating in the Rule 26 Conference: **Angela M. Taylor**

Do counsel have full authority to settle at Rule 16 Conference? **Yes.**

If not, client with such authority who will attend conference:

When did the parties hold the Rule 26 Conference? **02/17/2016**

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure? **02/19/2016**

Does either side expect to file a case-dispositive motion? **Yes** (yes/no)

If yes, under what Rule: Experian anticipates filing a dispositive motion under FRCP 56.

If yes, specify the issue: Experian is entitled to judgment as a matter of law on Plaintiff's FCRA claims

Proposed deadline for filing dispositive motions: **30 days after close of discovery**

Does either side anticipate the use of experts? **No**

If yes, what is the proposed deadline for expert discovery?

Approximate date case should be trial-ready:

Time for Plaintiff's case: **1-2 Days** Time for Defendant's case: **1-2 days**

Is a settlement conference likely to be helpful? **Yes** If so, when:

Early **No** (yes/no) After Discovery **Yes** (yes/no)

What is the outcome of your discussions with your clients about proceeding before a Magistrate Judge for the final disposition?

Plan for Discovery:

1. The parties anticipate that discovery should be completed within **120** days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? **60 days**
3. Have the parties discusses issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? **Yes**
4. Identify any other discovery issues which should be addresses at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which

should be included in a particularized discovery plan.

The parties anticipate submitting a protective order to treat as confidential documents relating to proprietary information.

5. If you contend the discovery period to exceed 90 days, please state reason:
The parties would like the opportunity to conduct settlement discussions after written discovery is completed, but before incurring the costs associated with conducting multiple party depositions.
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